

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Gabrielle Carlson, *on behalf of herself and all
others similarly situated,*

Plaintiff,

v.

Target Enterprise, Inc.,

Defendant.

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Civil Action No.: 4:18-cv-40139-TSH

MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiff Gabrielle Carlson (“Carlson”) hereby moves for entry of an Order granting preliminary approval of the Class Action Settlement Agreement between Carlson and Defendant Target Enterprise, Inc.

Carlson respectfully requests that the Court (i) conditionally certify the Settlement Class for purposes of settlement, (ii) appoint Plaintiff as the Settlement Class Representative; (iii) appoint Sergei Lemberg and Stephen F. Taylor of Lemberg Law, LLC, as Class Counsel; (iv) preliminarily approve the terms of the Settlement Agreement; (v) approve the form, content and method of delivering notice to the Settlement Class as set out in the Settlement Agreement as “the best notice that is practicable under the circumstances” (Fed. R. Civ. P. 23(c)(2)(B)); and (vi) schedule a final approval hearing in accordance with the deadlines proposed in the Settlement Agreement.

In support, Plaintiff submits the accompanying Memorandum of Law in Support of Motion to Preliminary Approve Class Action Settlement, the executed Settlement Agreement and its exhibits (A-E), the Declarations of proposed Class Counsel Sergei Lemberg and Stephen F. Taylor.

For the reasons set forth in the accompanying memorandum, Carlson respectfully requests that the Court enter the Preliminary Approval Order in the form attached as Exhibit C to the Settlement Agreement and submitted herewith as Exhibit A to this motion.

Respectfully Submitted,

Dated: June 14, 2019

Respectfully submitted:

/s/ Stephen Taylor

Sergei Lemberg

Stephen Taylor

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CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2019, I served a true and accurate copy of the foregoing to counsel of record through the Court's CM/ECF system which sent notice of such filing to the following:

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/s/ Stephen Taylor
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